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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES KLASKY,

Defendant.

No. CR 17-401-DMG

STIPULATION TO CONTINUE
SENTENCING DATE

Current Sentencing Date:
August 10, 2022, at 11:00AM
Proposed Sentencing Date:
October 19, 2022, at 11:00AM
Location:
Courtroom of the
Honorable Dolly M. Gee

Plaintiff United States of America, by and through its counsel
of record, Assistant United States Attorney Kristen A. Williams and
defendant Charles Klasky, by and through his counsel of record,
William Fleming, hereby stipulate as follows:

1. On or about July 5, 2017, the government filed an

1 information charging defendant with one count of conspiracy to
2 commit health care fraud in violation of Title 18, United States
3 Code, Section 371.

4 2. On August 9, 2017, defendant pled guilty to the single-
5 count information. Sentencing was initially set for November 15,
6 2017, but has since been continued, most recently to August 10,
7 2022.

8 3. The Probation Officer disclosed the Presentence Report to
9 the parties on July 5, 2022.

10 4. Pursuant to his plea agreement with the government,
11 defendant has cooperated with the government regarding United States
12 v. Omid, et al., CR 17-661(A)-DMG, including through lengthy
13 testimony at the trial of defendants Julian Omid, Surgery Center
14 Management, LLC, and Mirali Zarrabi. Because post-trial matters in
15 that case remain pending, it is possible that defendant's assistance
16 could still be required. A continuance is appropriate because the
17 government needs to consider fully any assistance provided by
18 defendant prior to taking a position as to defendant's substantial
19 assistance at sentencing.

20 5. Additionally, defense counsel is currently scheduled to be
21 in a five-day trial beginning the second week of September.

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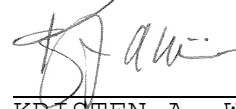
1 6. Accordingly, by this stipulation, the parties jointly move
2 to continue the sentencing date from August 10, 2022, to October 19,
3 2022.

4 IT IS SO STIPULATED.

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6 Dated: July 20, 2022

STEPHANIE S. CHRISTENSEN
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8 SCOTT M. GARRINGER
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11 KRISTEN A. WILLIAMS
Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 Dated: July 20, 2022

15 /s/ per email authorization
16 WILLIAM FLEMING

17 Attorney for Defendant
18 CHARLES KLASKY
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